

ZETLIN & DE CHIARA, LLP

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
HARTFORD FIRE INSURANCE COMPANY as
subrogor of Lycee Francais De New York,

07 Civ. 4084 (SHS) (AJP)

Plaintiff,

-against-

MAYRICH CONSTRUCTION CORP., LANGAN
ENGINEERING & ENVIRONMENTAL SERVICES,
INC., F.J. SCIAME CONSTRUCTION CO., INC.,
POLSHEK PARTNERSHIP, LLP & CANTOR
SEINUK GROUP, INC.,

Defendants.
----- X

**DEFENDANT POLSHEK PARTNERSHIP LLP'S
RESPONSE TO MAYRICH CONSTRUCTION CORP. AND F.J. SCIAME
CONSTRUCTION CO., INC.'S NOTICE TO PRODUCE PURSUANT TO RULE 26**

Defendant Polshek Partnership LLP ("Polshek") by its attorneys Zetlin & De Chiara LLP, submits the following as and for its response to Defendants Mayrich Construction Corp. and F.J. Sciamme Construction Co., Inc.'s Notice to Produce Pursuant to Rule 26, dated July 26, 2007:

TO ALL PARTIES:

Copies of any and all photographs which depict the scene of the accident or occurrence or injuries or damages sustained by the plaintiff(s).

RESPONSE:

Polshek objects to this request as overly broad, unduly burdensome and not reasonably tailored to lead to the production of admissible evidence. Notwithstanding this objection, Polshek will produce all responsive and non-privileged documents, if any, in its possession as it relates to the subject matter of this lawsuit for copying and inspection at a mutually convenient time.

Polshek reserves the right to amend its disclosures pursuant to the requirements of the FRCP.

Dated: New York, New York
August 23, 2007

ZETLIN & DE CHIARA, LLP

By: 

Bill Chimos (BC-9381)

*Attorneys for Defendant Polshek
Partnership LLP*

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TO: SEE SERVICE LIST